



FEDERAL ELECTION COMMISSION  
WASHINGTON D C 20463

November 13, 2003

**VIA HAND DELIVERY**

Cassandra Lentchner, Esq.  
Perkins Coie LLP  
607 Fourteenth Street NW  
Washington, DC 20005

RE: MUR 5031 (Friend of Lane Evans and the 17<sup>th</sup> District Victory Fund)

Dear Ms. Lentchner:

On October 21, 2003, the Federal Election Commission found that there is probable cause to believe that your clients, Friends of Lane Evans and Samuel Gilman, as treasurer, violated 2 U.S.C. §§ 441a(f), 433, 434, and 441b, provisions of the Federal Election Campaign Act of 1971, as amended. The Commission also found that there is probable cause to believe that your other clients, the 17<sup>th</sup> District Victory Fund and Linda Anderson, as treasurer, violated 2 U.S.C. §§ 433, 441a(f), 434, and 441b. These findings were based on the theory that Friends of Lane Evans is affiliated with the 17<sup>th</sup> District Victory Fund, which was one of two alternative theories set forth in the General Counsel's Briefs.

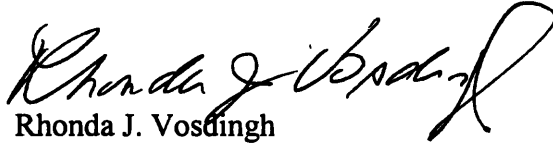
On November 12, 2003, the Commission found probable cause to believe that your clients violated the same aforementioned sections of the Act based on the alternative theory that Victory Fund made excessive in-kind contributions to the Evans Committee through coordinated expenditures. This additional finding makes it possible to conciliate this matter on the basis of either or both alternative theories. Additionally, should this matter proceed to litigation, this Office would be authorized to utilize either or both alternative theories.

Enclosed is a conciliation agreement that reflects the Commission's recent findings. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make the check for the civil penalty payable to the Federal Election Commission.

If you have any questions, or if you wish to arrange for another meeting to discuss this matter, please contact Brant Levine, the attorney assigned to this matter, at (202) 694-1572.

Sincerely,

Lawrence H. Norton  
General Counsel

BY:   
Rhonda J. Vosdingh  
Associate General Counsel  
For Enforcement

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